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| 12 | | | |
| 13 | | | |
| 14 | F: (702) 382-0212 Attorneys for Plaintiff | | |
| 15 | UNITED STATES DISTRICT COURT | | |
| 16 | DISTRICT OF NEVADA | | |
| 17 | | | |
| 18 | 2-WAY COMPUTING, INC., a Nevada | Case No.: 2:16-cv-00946-RFB-GWF | |
| 19 | corporation, | UNOPPOSED MOTION AND | |
| 20 | Plaintiff, | PESPOND TO COMPLAINT | |
| 21 | vs. | RESPOND TO COMPLAINT | |
| 22 | | (FIRST REQUEST) | |
| 23 | GENBAND INC., a Delaware corporation, | | |
| 24 | Defendant. | | |
| 25 | Plaintiff 2-Way Computing, Inc. ("Plaintiff") hereby files this Unopposed Motion and | | |
| 26 | [Proposed] Order to Extend Deadline for Defendant to Respond to the Complaint in accordance | | |

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request is not made after the response deadline which is currently June 7, 2016.

with LR IA 6-1 and LR IA 6-2. This is the first request to extend the proposed deadline. This

| 1 | The Complaint (Doc. 1) was filed on April 26, 2016 and was served on Genband, Inc. on | | |
|----------|---|--|--|
| 2 | or about May 17, 2016. The current deadline to respond to the Complaint is June 7, 2016. | | |
| 3 | The parties believe that the litigation of this matter will be best served by allowing an | | |
| 4 | additional thirty (30) days to discuss possible settlement of this matter and allow Defendant | | |
| 5 | additional time to investigate the claims of the Complaint and obtain Nevada counsel. Because | | |
| 6 | an attorney for Defendant has not made an appearance in this case, Plaintiff files this motion to | | |
| 7 | extend Defendant's deadline as an unopposed motion. | | |
| 8 | Accordingly, Plaintiff respectfully requests that this Court grant its request to continue | | |
| 9 | the deadline for Defendant to respond to the Complaint until July 7, 2016. | | |
| 10 | | | |
| 11 | | BORGHESE LEGAL, LTD. | |
| 12 | | /s/ Mark Borghese | |
| 13 | DATED: <u>June 6, 2016.</u> | Mark Borghese, Esq. | |
| 14 | | 10161 Park Run Drive, Suite 150 Las Vegas, Nevada 89145 | |
| 15 | | RUSS, AUGUST & KABAT | |
| 16 | | Reza Mirzaie, Esq. Stanley H. Thompson, Jr., Esq. | |
| 17 18 | | 12424 Wilshire Boulevard, 12th Floor Los Angeles, California 90025 Attorneys for Plaintiff | |
| 19 | | According to the familiary | |
| 20 | <u>ORDER</u> | | |
| 21 | IT IS SO ORDERED. | | |
| 22 | | | |
| 23 | UNITED STATES MAGISTRATE JUDGE | | |
| 24 | | | |
| 25 | | | |
| 26 | DATED: <u>6/7/2016</u> | | |
| 27 | | | |
| 28 | | | |